

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, et al., individually and
on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., et al.,

Defendants.

No. 1:23-cv-08292-SHS
No. 1:23-cv-10211-SHS

**DECLARATION OF ANNA J.
FREYMAN IN SUPPORT OF
RESPONSE TO OPENAI'S LETTER-
MOTION REQUESTING A PRE-
MOTION CONFERENCE**

I, Anna J. Freymann, declare:

1. I am an attorney duly admitted to practice in the State of New York and before this Court. I am an associate with the law firm LIEFF CABRASER HEIMANN & BERNSTEIN, LLP, attorneys for Plaintiffs in *Authors Guild et al. v. OpenAI, Inc., et al.*, No. 1:23-cv-08292-SHS. I have personal knowledge of the facts set forth in the declaration. If called as a witness, I could and would competently testify as to these facts under oath:

2. I submit this Declaration in support of Plaintiffs' Response to OpenAI's Letter-Motion Requesting a Pre-Motion Conference (Dkt. 232).

3. To date, Plaintiffs have produced a total of 13,365 documents. 1,104 of those documents were produced today. More productions are forthcoming.

4. In addition, Plaintiffs have agreed to review at least 13,000 additional documents for responsiveness and production as ESI search term negotiations remain ongoing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28th day of October, 2024 in Brooklyn, NY.

By: 
ANNA FREYMAN